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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 Waymo LLC,
20 Plaintiff,
21 v.
22 Uber Technologies, Inc.; Ottomotto LLC; Otto
23 Trucking LLC,
24 Defendants.

25 Case No. 3:17-cv-00939-WHA
26 **DECLARATION OF HONG-AN VU IN**
27 **SUPPORT OF DEFENDANT OTTO**
28 **TRUCKING'S ADMINISTRATIVE**
29 **MOTION TO FILE UNDER SEAL**
30 **EXHIBIT 1 TO THE DECLARATION OF**
31 **HONG-AN VU IN SUPPORT OF ITS**
32 **REPLY IN SUPPORT OF MOTION TO**
33 **ENFORCE THE COURT'S JUNE 7, 2017**
34 **ORDER (DKT. 563)**
35 Date: August 16, 2017
36 Time: 8:00 a.m.
37 Courtroom: 8, 19th Floor
38 Judge: Honorable William Alsup
39 Trial Date: October 10, 2017
40 Filed/Lodged Concurrently with:
41 1. Admin. Mtn. to File Document Under Seal
42 2. [Proposed] Order
43 3. Unredacted Version of Ex. 1
44 4. Proof of Service

1 I, Hong-An Vu, declare as follows:

2 1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for
 3 Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters
 4 within my own personal knowledge and if called as a witness, I could and would competently
 5 testify to the matters set forth herein. I make this declaration in support of Defendant Otto
 6 Trucking’s Administrative Motion to File Under Seal Exhibit 1 to the Declaration of Hong-An Vu
 7 in Support of Its Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order (Dkt.
 8 563).

9 2. I have reviewed the following documents and confirmed that only the portions
 10 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1 to the Declaration of Hong-An Vu in Support of Defendant Otto Trucking’s Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563) (“Exhibit 1”)	Entire Document

11 3. Otto Trucking seeks to seal the entirety of Exhibit 1 because Plaintiff Waymo LLC
 12 (“Waymo”) has designated the information “highly confidential” and “attorneys’ eyes only.” Otto
 13 Trucking does not oppose the merits of sealing the material designated by Waymo, and anticipates
 14 that Waymo will file declarations in accordance with Local Rule 79-5.

15 4. Otto Trucking’s request to seal is narrowly tailored to those portions of the
 16 motion’s supporting documents that merit sealing.

17
 18
 19 I declare under penalty of perjury under the laws of the United States that the foregoing is
 20 true and correct. Executed this 28th day of July, 2017 in Los Angeles, California.

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 22
 23
 24
 25
 26 /s/ Hong-An Vu
 27 Hong-An Vu
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